

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

Petition of South Carolina Electric & Gas	)	
Company for Updates and Revisions to	)	
Schedules Related to the Construction of a	)	Docket No. 2016-223-E
Nuclear Base Load Generation Facility at	)	
<u>Jenkinsville, South Carolina</u>	)	

**PETITION TO INTERVENE OF  
CMC STEEL SOUTH CAROLINA**

CMC Steel South Carolina ("CMC") hereby petitions to intervene as a party of record in the above-captioned proceeding. CMC states the following grounds in support of its petition.

1. CMC owns and operates a steel manufacturing facility in Cayce, South Carolina. This facility utilizes an electric arc furnace ("EAF") to melt and recycle steel. This process requires CMC to purchase very large quantities of electricity from South Carolina Electric & Gas Company ("SCE&G") at a cost of millions of dollars per year. Because the cost of electricity is one of the major costs of steel-making utilizing an EAF, the cost of electricity directly affects CMC's ability to produce steel at a competitive price. CMC is one of the largest retail customers of SCE&G.

2. Due to the magnitude and unique characteristics of its load, CMC cannot be adequately represented by any other party to this proceeding. At this stage of the proceeding, CMC has not fully determined what positions it may take.

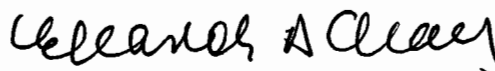
3. CMC's mailing address is:

CMC Steel South Carolina  
310 New State Road  
Cayce, SC 29033

4. CMC is represented by Eleanor Duffy Cleary, Cleary Law LLC, 1116 Blanding Street, Suite 2B, Columbia, South Carolina 29201, local counsel licensed to practice in South Carolina. Service and correspondence regarding this proceeding should be sent to the undersigned.

WHEREFORE, for the reasons set forth above, CMC respectfully requests permission to intervene in this proceeding.

Respectfully submitted,



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Eleanor Duffy Cleary  
Cleary Law LLC  
1116 Blanding Street, Suite 2B  
Columbia, SC 29201  
Telephone: 803-376-0075

*Local Counsel for CMC Steel South Carolina*

July 6, 2016

**BEFORE THE  
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

**Docket No. 2016-223-E**

Petition of South Carolina Electric & Gas	)	
Company for Updates and Revisions to	)	
Schedules Related to the Construction of a	)	CERTIFICATE OF SERVICE
Nuclear Base Load Generation Facility at	)	
<u>Jenkinsville, South Carolina</u>	)	

This is to certify that I have caused to be served this 6th day of July, 2016, a copy of the *Petition to Intervene of CMC Steel South Carolina* via first-class mail, postage prepaid, to the persons named below at the addresses set forth below.

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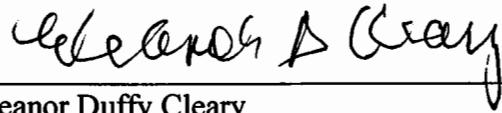
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